

CITIZENS TELEPHONE COMPANY, INC.

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February 7, 2014

By ECFS

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554

**Re: EB Docket No. 04-296
Request for Waiver of 47 C.F.R. 11
Citizens Telephone Company
Written *Ex Parte* Communication**

Dear Ms. Dortch:

Citizens Telephone Company ("Citizens" or "Company") hereby submits this written *ex parte* notice to inform the Federal Communications Commission ("FCC") of progress that the Company has made towards becoming compliant with the FCC's CAP requirements for Emergency Alert System ("EAS") equipment.¹

Citizens filed a petition for waiver of the CAP Requirements on June 26, 2012 ("Petition").² In the Petition, Citizens explained that it was not financially viable to purchase the CAP-compliant EAS equipment for its small, 102-customer cable system in Smithville, GA because the Company was in the process of collapsing the Smithville headend and connecting the Smithville customers to its Lake Blackshear, GA headend. The Lake Blackshear headend is CAP-compliant, and Citizens would face significant, burdensome costs to purchase and install CAP-compliant equipment on a system that was scheduled to be collapsed within a year. Citizens explained in the Petition that its customers would be subjected to an unjustified end-user rate increase of approximately 8.5-9% per month, and 15-20% of the customers would likely cancel their service as a result of a rate increase.

At the time that Citizens filed the Petition in 2012, the Company anticipated that it would take an additional year to collapse the Smithville headend, as the Company had

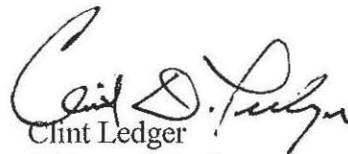
¹ 47 C.F.R. § 11.

² Request for Waiver of CAP Requirements by Citizens Telephone Company. EB Docket No. 04-296 (filed June 26, 2012) ("Petition").

already experienced some setbacks in the construction schedule. In order to fully integrate the Smithville system with the Lake Blackshear headend, Citizens needs to plow fiber approximately 13.2 miles. Throughout 2013, Citizens consistently worked on the project, but continued to experience various construction schedule setbacks. As of February 2014, Citizens reports that construction is approximately 30% complete but the Smithville cable system will not likely be integrated with the CAP-compliant Lake Blackshear headend until the end of 2014. The financial hardship conditions that Citizens described in the Petition remain the same at this time—the Company cannot justify investing in the CAP-compliant EAS equipment for a system that will inevitably be collapsed, as the cost would be passed along to customers through a significant rate increase. Therefore, Citizens respectfully requests that the FCC grant the Company's Petition for the duration of 2014.

Citizens will notify the FCC if the Company completes the construction and Smithville headend collapse by the end of 2014, or otherwise, if the Company continues to experience any hardships with the construction that may delay completion of the project beyond the end of 2014.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Clint D. Ledger". The signature is stylized with a large, looping "C" and a distinct "D".

Clint Ledger
Citizens Telephone Company
134 N Baily Ave.
Leslie, GA 31764